



August 7, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

West Hartford Community Television respectfully submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

West Hartford Community Television is a nationally recognized community media center that encourages residents to be active participants in our town by providing an open forum for free speech community dialogue, cultural exchange and artistic expression. We are a unique local media that serves around 20,000 cable subscribers in the Town of West Hartford. Our programming includes...

- Mr. Pops Neighborhood, monthly program produced by Reverend Aaron Lewis, President of the Each One, Teach One Foundation. He was shot in the head leaving him blind but has dedicated his life to helping kids stay off the streets.
- Our Be The Media journalism project has a camera embedded at The American School for the Deaf for the production of school stories.
- We have a collaborative work-study program with the Intensive Education Program a school in town that strives to enable New England students with autism and developmental and physical impairments become all they can be - responsible and productive citizens.

- We facilitated series of programs with the West Hartford Advisory Commission for Persons with Disabilities to assist with emergency preparedness and how to vote.

We also carry governmental and educational programs like NASA 360, Classic Arts Showcase and electronic field trips from arts and museums which include closed captioning on our channel. The onscreen video programming guide of our multichannel video programming distributors (MVPD), Comcast and AT&T do not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. Comcast's response to our request for program guides at a Hartford Area Television Advisory Council Meeting was that it was technologically impossible to distribute our information on the program guide because all five towns in the Hartford area would need to have their own guide.

The WHC-TV Board of Directors recognizes the importance for the program guide in the way that all viewers currently watch television. Our latest server upgrade allows us to export information directly to the TV Guide channel. However, when we contacted the TV Guide Channel, we were told that only the local cable operator can submit information for the program guides. We have not been able to date to get around this "Catch-22. Currently, we are left with the description "local programming" on the program guide. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

Our community is also served by AT&T's U-verse multichannel video service, which has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, the Alliance for Community Media, and Chicago Access Corporation (CAN TV). Unlike the linear PEG channels on our incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number 5, 95 or 96, with AT&T's PEG product the visually impaired must somehow, after punching in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of our PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually impaired must somehow figure out how to "see" and navigate. In our area, AT&T's "99" application footprint includes the entire state and requires the navigation of three screens, including a splash page with AT&T information as the software launches and loads.

The following comment is representative of the response we have received from viewers who are not disabled...

**From:** Janice and Steve Barshay [mailto:jsbarshay@gmail.com]  
**Sent:** Monday, October 17, 2011 9:38 PM  
**To:** Jennifer Evans  
**Subject:** WHCTV and AT&T

Jen,

Please do whatever you need to do to use this letter in your struggle for better AT&T cable access.

A few days ago, I was reading an article in the Autumn 2011 edition of *Seasons of West Hartford* magazine. Something I read in the article prompted me to finally write a letter that I have been meaning to write ever since I changed my cable service to AT&T. Here's what I read:

"The best thing that ever happened to community access is the remote control,' says Peter Talbot, government and public affairs manager for Cox Communications, which provides public access to multiple Connecticut communities, including Glastonbury. Viewers stumble upon local access channels while channel surfing, and the eclectic programming hooks them."

The problem is that the way access is provided on AT&T, this does not happen. You cannot channel surf and see what is on West Hartford Community TV at the moment. There is a whole process to get there. I waited for a year or two before switching to AT&T, and the reason was that I wanted access to WHCTV to be easy. When I finally switched, with the understanding that it would be like the access I was used to on Comcast, I was terribly disappointed to find the current system. I almost never watch WHCTV anymore because it is not a part of my surfing.

I am writing this letter in support of any effort to get AT&T to dedicate appropriate band space to carry WHCTV just like any other channel. Just read the quote above. It says it all.

Thank you very much,  
Janice Barshay

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Jennifer Evans

Executive Director

West Hartford Community Television